

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

IN RE: Amy Fay Robinson

Case No.: 11-31815-KRH

Debtor(s)

Chapter 13

Plaintiffs,

v.

Adversary Proceeding No.13-03057

JP Morgan Chase Bank, N.A.
PO Box 182106
Columbus, OH 43218-2106

Stewart Title & Escrow, Inc.
10505 Judicial Dr., Ste 300
Fairfax, VA 22030

Defendants.

MOTION FOR DEFAULT JUDGMENT UNDER FED. R. BANKR. P. 7055(a)

TO THE DEFENDANT, DEFENDANT'S ATTORNEY(S), AND OTHER
INTERESTED PARTIES:

1. The name of the Defendants against whom default judgment is sought: JP Morgan Chase Bank, N.A. and Stewart Title & Escrow, Inc.

2. The Plaintiffs filed the Complaint in the above-captioned proceeding on or about March 14, 2013.

3. The Summons, Scheduling Order, and Complaint were served on an officer of the Defendants, by certified mail, return receipt requested, and by first class mail on or about March 18, 2013.

4. A confirmed copy of the completed Return of Service has been filed with the Court.

5. The time for filing an Answer or other response expired on April 15, 2013.

6. No Answer or other response has been filed or served by the Defendants.
7. The default of the Defendants has been entered.
8. A pretrial conference was held on 04/24/2013 at 9:00 AM
9. As proof that the Plaintiffs are entitled to the relief requested in the Complaint, the Plaintiffs rely on the Complaint and the documents filed within.

DECLARATION OF NON-MILITARY STATUS

No Defendant named in paragraph 1 above is in the military service so as to be entitled to the benefits of the Soldiers' and Sailors' Civil Relief Act of 1940 (50 U.S.C. Appen.' 501, *et seq.*).

WHEREFORE, the Plaintiffs pray that this Court enter a Default Judgment in favor of the Plaintiffs. A copy of the proposed Default Judgment is submitted herewith and has been served.

Date: April 30, 2013

Respectfully Submitted,

/s/ Roger C. Hurwitz
Roger C. Hurwitz, VA Bar # 51016
4036 Plank Rd
Fredericksburg, VA 22407
(540) 412-1463

PROOF OF SERVICE BY MAIL

COMMONWEALTH OF VIRGINIA
COUNTY OF SPOTSYLVANIA, to wit:

I am employed in the above County of Spotsylvania, Commonwealth of Virginia. I am over the age of 18 and am not a party to the within action. My business is as follows: Attorney for the Plaintiffs/Debtors herein.

On April 30, 2013, I served the foregoing document, described as Request for Entry of Default Under Fed. R. Bankr. P. 7055(a), on the interested parties at their last known address in this action by placing a true and correct copy thereof in a sealed envelope with postage thereon fully prepaid in a receptacle of the United States Mail at Fredericksburg, Spotsylvania County, Virginia, addressed as follows:

JP Morgan Chase Bank, N.A.
PO Box 182106
Columbus, OH 43218-2106

Mr. Jamie Dimon, Chairman and CEO .
JP Morgan Chase,
270 Park Ave
New York, NY 10017

Stewart Title & Escrow, Inc.
10505 Judicial Dr., Ste 300
Fairfax, VA 22030

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 30th day of April, 2013

/s/ Roger C. Hurwitz
Roger C. Hurwitz